

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

IN RE:

RTS Law Group, PLLC

and

Jeanne Ann Pennebaker, PLLC

Chapter 13

**NOTICE OF MOTION AND OPPORTUNITY FOR HEARING**

**TAKE NOTICE** that RTS Law Group, Attorney for the Debtors in this case, and Jeanne Ann Pennebaker, have filed a **MOTION TO SUBSTITUTE LEGAL COUNSEL and MOTION TO WITHDRAW** with the Court.

Your rights may be affected. You should read this notice carefully and discuss it with your Attorney, if you have one. If you do not have an Attorney that practices Bankruptcy law, it is strongly advised that you consult one.

IF YOU DO NOT WANT THE COURT TO APPROVE THE REQUESTED RELIEF, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS, THEN ON OR BEFORE **MARCH 9, 2017**, YOU OR YOUR ATTORNEY MUST DO THREE (3) THINGS:

1. File with the Court a written response explaining your position in the above referenced matter. If you mail your request to the Court for filing, you must mail it early enough so the Court will receive it by the date stated above.

Mail to: US Bankruptcy Court  
401 West Trade Street, Charlotte, NC 28202

2. On or before the date above, you must also mail or fax a copy of your written response to:

Ryan T. Smith	Jeanne Ann Pennebaker	Warren L. Tadlock
RTS Law Group, PLLC	Jeanne Ann Pennebaker, PLLC	Chapter 13 Trustee
128 N. McDowell St.	10130 Perimeter Pkwy, suite 200	5970 Fairview Rd., ste.650
Charlotte, NC 28204	Charlotte, NC 28216	Charlotte, NC 28210

3. Attend a hearing that will be held on **March 28, 2017, at 10:00am** at:

Charles R. Jonas Federal Building, US Courthouse  
401 W. Trade St., Charlotte, NC 28202

If you or your Attorney does not take these steps, A **HEARING WILL NOT BE HELD** and the Court may decide to enter an order granting the relief requested.

This, the 24<sup>th</sup> day of February, 2017.

/s/ Ryan T. Smith

Ryan T. Smith  
RTS Law Group, PLLC  
128 N. McDowell, Suite A  
Charlotte, NC 28204  
(704) 552-4444

/s/Jeanne Ann Pennebaker

Jeanne Ann Pennebaker, NC Bar #39174  
Jeanne Ann Pennebaker, PLLC  
10130 Perimeter Parkway, Suite 200  
Charlotte, NC 28216  
(704) 602-5233

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**IN RE:**

**RTS Law Group, PLLC**

**and**

**Jeanne Ann Pennebaker, PLLC**

**Chapter 13**

**MOTION TO SUBSTITUTE LEGAL COUNSEL  
and MOTION TO WITHDRAW**

**COMES NOW** Ryan T. Smith, of RTS Law Group, PLLC and, Jeanne Ann Pennebaker of Jeanne Ann Pennebaker, PLLC, and, pursuant to Local Rules 2091-1(c) and 9013-1(e), and respectfully request of the Court the following:

1. Jeanne Ann Pennebaker is leaving her employment at RTS Law Group, PLLC, and RTS Law Group will no longer be practicing in the area of bankruptcy law. The clients signed their engagement letters with RTS Law Group, PLLC.
2. Jeanne Ann Pennebaker, PLLC, agrees to appear as an individual and attorney of record in place of her appearance as Jeanne Ann Pennebaker, RTS Law Group, in the cases listed on the attached Exhibit A.
3. Jeanne Ann Pennebaker, Attorney at Law, is the original attorney of record, is knowledgeable in Bankruptcy law and agrees to continue zealously representing each client in an individual capacity as Jeanne Ann Pennebaker, PLLC.
4. Each of the clients listed on Exhibit A has consented to representation by Jeanne Ann Pennebaker.
5. That granting this motion is in the best interests of the estates.

Wherefore, RTS Law Group respectfully prays of the Court the following:

1. That RTS Law Group, PLLC be withdrawn as counsel in each of the cases listed on Exhibit A;
2. That RTS Law Group, PLLC be fully discharged of any further responsibility for representing any of the debtors in the cases listed on Exhibit A;
3. That Jeanne Ann Pennebaker, PLLC be substituted in as counsel in each of the cases listed on Exhibit A;
4. For other such relief as the Court shall deem just and proper.

This, the 24<sup>th</sup> day of February, 2017.

/s/ Ryan T. Smith

Ryan T. Smith  
RTS Law Group, PLLC  
128 N. McDowell, Suite A  
Charlotte, NC 28204  
(704) 552-4444

/s/Jeanne Ann Pennebaker

Jeanne Ann Pennebaker, NC Bar #39174  
Jeanne Ann Pennebaker, PLLC  
10130 Perimeter Parkway, Suite 200  
Charlotte, NC 28216  
(704) 602-5233

EXHIBIT A  
CHAPTER 13 CHARLOTTE

13-31111 Marlene M Brogan  
13-31962 Reco Robinson  
13-32039 Joseph C Summa  
13-32105 Kathryn Ann Harrington  
13-32232 Tanya A Johns  
13-32516 Darryl Butler and Marsha Butler  
14-30212 Vincent Sardo  
14-30325 Treba R Stacy  
14-30397 John Christopher Rhodes and Jennifer J Rhodes  
14-30719 Keesha Ramsue  
14-30778 Joseph Watson Long  
14-31502 Crystal Collette Baldwin  
14-31791 Neely Wallace Ayers  
14-32115 Cara Rusmisell  
15-30287 Christopher Garcia  
15-30292 Chanda Linell Spates  
15-30523 Tanja R Ennis  
15-30640 Blake Douglas and Wendy Peterson Douglas  
15-30963 Timothy Earl Collins  
15-31121 Sheila R Pierfelice  
15-31167 Margie Marie Ayers  
15-31313 Casey L Bryant Sr  
15-31426 Guanah D Davis  
15-31523 Cynthia Bryon  
15-31565 Henry Bright Lindler  
15-31566 Richard M Melvin and Pattie M Melvin  
15-31820 Michael E Holland and Jennifer Holland  
15-31940 Kelly Antoniazzi Walters  
16-30051 Ida Sharlon-Dunlap Johnson  
16-30450 Shireka Latoya Gilmore  
16-30646 Candace L Stradford  
16-30858 Richard S Newkirk  
16-31055 Douglas Corrigan  
16-31072 Paul Joseph Destasio and Lindsay Jennifer Destasio  
16-31267 Patrick Bennett  
16-31282 Lisa Dawn Snyder  
16-31316 Andrew Todd Brooke and Colette Joy Brooke  
16-31436 Toye Drayton  
16-31550 John Lapsley Duncan Jr.  
16-31858 Mary H. Bostic-Russell  
16-31862 John C. Prentzas  
16-31882 Michael A. Massardo  
16-31892 Crystal Brannon

17-30085 Edward M Mihilek  
17-30086 Gregory Alan Elam  
17-30097 Michelle McCabe  
17-30249 Erin Canipe  
17-30256 Brian and Nicholle Heath

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

<b>RTS Law Group, PLLC</b>	)	<b>Chapter 13</b>
	)	
<b>and</b>	)	<b>16-31267</b>
	)	
<b>Jeanne Ann Pennebaker, PLLC</b>	)	<b>Patrick Bennett</b>
	)	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the attached Motion To Substitute Legal Counsel and Motion To Withdraw either by Electronic Case Filing as indicated below or by depositing copies of same in the exclusive care and custody of the United States Postal Service, with proper postage thereto affixed to the parties listed herein below:

Attached ECF creditor list

This the 24rd day of February, 2017

/s/Jeanne Ann Pennebaker  
Jeanne Ann Pennebaker  
Attorney for the Debtor  
RTS Law Group  
North Carolina Bar Number 39174  
128-A N. McDowell Street  
Charlotte, NC 28204  
Phone: (704) 552-4444  
Fax: (704) 973-9468

Label Matrix for local noticing  
0419-3  
Case 16-31267  
Western District of North Carolina  
Charlotte  
Fri Feb 24 12:18:49 EST 2017

United States Attorney  
227 West Trade Street  
Carillon Bldg, Suite 1700  
Charlotte, NC 28202-1675

Charlotte Division  
401 West Trade Street  
Charlotte, NC 28202-1633

Appurgent Care  
11821 Rock Landing Dr  
Newport News, VA 23606-4207

(p)BB AND T  
PO BOX 1847  
WILSON NC 27894-1847

Bank of America Home Loans  
PO Box 31785  
Tampa, FL 33631-3785

Bank of America N.A.  
P O Box 982284  
El Paso, TX 79998-2284

Brock & Scott, PLLC  
5431 Oleander Dr # 200  
Wilmington, NC 28403-5857

Chase  
PO Box 15298  
Wilmington, DE 19850-5298

Credit Control Corp.  
11821 Rock Landing Dr  
Newport News, VA 23606-4207

Dentist  
1110 Navaho Dr Ste 501  
Raleigh, NC 27609-7369

Ford Motor Credit  
PO Box 542000  
Omaha, NE 68154-8000

Internal Revenue Service  
P.O. Box 7317  
Philadelphia, PA 19101-7317

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Kellam & Pettit, P.A.  
2701 Coltsgate Rd # 300  
Charlotte, NC 28211-3594

Kross/Lieberman & Stone  
991 Aviation Pkwy Ste 30  
Morrisville, NC 27560-8564

Medical  
2651 Warrenville Rd Ste 500  
Downers Grove, IL 60515-5559

Medical  
4135 Southstream Blvd # 400  
Charlotte, NC 28217-4636

Medical  
PO Box 1629  
Maryland Heights, MO 63043-0629

North Carolina Department of Revenue  
Bankruptcy Unit  
P.O. Box 1168  
Raleigh, NC 27602-1168

Optimum Outcomes  
PO Box 58015  
Raleigh, NC 27658-8015

PMAB  
4135 Southstream Blvd # 400  
Charlotte, NC 28217-4636

SPS  
PO Box 65250  
Salt Lake City, UT 84165-0250

U.S. Bank NA, successor trustee to  
Bank of America, NA  
Select Portfolio Servicing, Inc.  
P.O. Box 65250  
Salt Lake City, UT 84165-0250

US Bank  
PO Box 3447  
Oshkosh, WI 54903-3447

Wells Fargo Bank, N.A.  
Box 5058 MAC P6053-021  
Portland, OR 97208-5058

Jeanne Ann Pennebaker  
RTS Law Group  
128 N. McDowell St.  
Suite A  
Charlotte, NC 28204-2202

Patrick Bennett  
240 Fenton Pl  
Charlotte, NC 28207-1914

Warren L. Tadlock  
5970 Fairview Road, Suite 650  
Charlotte, NC 28210-2100

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

BB&T  
PO Box 200  
Wilson, NC 27894-0200

(d)BB&T Bankruptcy  
PO Box 1847  
Wilson NC 27894

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)U.S. Bank NA, successor trustee to Bank of	End of Label Matrix	
	Mailable recipients	28
	Bypassed recipients	1
	Total	29